

MAJOR SOURCE OPERATING PERMIT

Permitee: **Jenkins Brick Company**

Facility Name: **Montgomery Plant**

Facility No.: 209-0011

Location: Montgomery, Alabama

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Ala. Code §§22-28-1 to 22-28-23 (1997 Rplc. Vol. and 2005 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, Ala. Code §§22-22A-1 to 22-22A-15 (1997 Rplc. Vol. and 2005 Cum. Supp.), and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

Issuance Date: Draft

Expiration Date: Draft

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General Permit Provisos

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<p>1. <u>Transfer</u></p> <p>This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in Rule 335-3-16-.13(1)(a)5.</p> <p>2. <u>Renewals</u></p> <p>An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.</p> <p>The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.</p> <p>3. <u>Severability Clause</u></p> <p>The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivision, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.</p> <p>4. <u>Compliance</u></p> <p>(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.</p> <p>(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.</p>	<p>Rule 335-3-16-.02(6)</p> <p>Rule 335-3-16-.12(2)</p> <p>Rule 335-3-16-.05(e)</p> <p>Rule 335-3-16-.05(f)</p> <p>Rule 335-3-16-.05(g)</p>

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<p>5. <u>Termination for Cause</u></p> <p>This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.</p> <p>6. <u>Property Rights</u></p> <p>The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.</p> <p>7. <u>Submission of Information</u></p> <p>The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.</p> <p>8. <u>Economic Incentives, Marketable Permits, and Emissions Trading</u></p> <p>No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.</p> <p>9. <u>Certification of Truth, Accuracy, and Completeness:</u></p> <p>Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.</p>	<p>Rule 335-3-16-.05(h)</p> <p>Rule 335-3-16-.05(i)</p> <p>Rule 335-3-16-.05(j)</p> <p>Rule 335-3-16-.05(k)</p> <p>Rule 335-3-16-.07(a)</p>

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<p>10. <u>Inspection and Entry</u></p> <p>Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:</p> <ul style="list-style-type: none"> (a) Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit; (b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit; (c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit; (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements. 	<p>Rule 335-3-16-.07(b)</p>
<p>11. <u>Compliance Provisions</u></p> <ul style="list-style-type: none"> (a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance. (b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit. 	<p>Rule 335-3-16-.07(c)</p>
<p>12. <u>Compliance Certification</u></p> <p>A compliance certification shall be submitted annually within 60 days after the effective date of this permit.</p> <ul style="list-style-type: none"> (a) The compliance certification shall include the following: <ul style="list-style-type: none"> (1) The identification of each term or condition of this permit that is the basis of the certification; 	<p>Rule 335-3-16-.07(e)</p>

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<p>(2) The compliance status;</p> <p>(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements);</p> <p>(4) Whether compliance has been continuous or intermittent;</p> <p>(5) Such other facts as the Department may require to determine the compliance status of the source;</p> <p>(b) The compliance certification shall be submitted to:</p> <p style="padding-left: 40px;">Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463</p> <p style="padding-left: 80px;">and to:</p> <p style="padding-left: 40px;">Air and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303</p>	
<p>13. <u>Reopening for Cause</u></p> <p>Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:</p> <p>(a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.</p>	<p>Rule 335-3-16-.13(5)</p>

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<p>(b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.</p> <p>(c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.</p> <p>(d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.</p>	
<p>14. <u>Additional Rules and Regulations</u></p> <p>This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.</p>	<p>§22-28-16(d), Code of Alabama 1975, as amended</p>
<p>15. <u>Equipment Maintenance or Breakdown</u></p> <p>(a) In the case of shutdown of air pollution control equipment (which operates pursuant to any permit issued by the Director) for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Director at least twenty-four (24) hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include, but is not limited to the following:</p> <p>(1) Identification of the specific facility to be taken out of service as well as its location and permit number;</p> <p>(2) The expected length of time that the air pollution control equipment will be out of service;</p>	<p>Rule 335-3-1-.07(1), (2)</p>

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<p>(3) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;</p> <p>(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;</p> <p>(5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.</p> <p>In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director shall be notified when the breakdown has been corrected.</p>	
<p>16. <u>Operation of Capture and Control Devices</u></p> <p>All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.</p>	<p>§22-28-16(d), Code of Alabama 1975, as amended</p>
<p>17. <u>Obnoxious Odors</u></p> <p>This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.</p>	<p>Rule 335-3-1-.08</p>
<p>18. <u>Fugitive Dust</u></p>	

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<p>(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.</p> <p>(b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:</p> <p>(1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;</p> <p>(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;</p> <p>(3) By paving;</p> <p>(4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;</p> <p>Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.</p>	<p>Rule 335-3-4-.02</p>
<p>19. <u>Additions and Revisions</u></p> <p>Any modifications to this source shall comply with the modification procedures in Rules 335-3-16-.13 or 335-3-16-.14.</p>	<p>Rule 335-3-16-.13 and .14</p>
<p>20. <u>Recordkeeping Requirements</u></p> <p>(a) Records of required monitoring information of the source shall include the following:</p> <p>(1) The date, place, and time of all sampling or measurements;</p>	<p>Rule 335-3-16-.05(c)2.</p>

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<ul style="list-style-type: none"> (2) The date analyses were performed; (3) The company or entity that performed the analyses; (4) The analytical techniques or methods used; (5) The results of all analyses; and (6) The operating conditions that existed at the time of sampling or measurement. <p>(b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.</p>	
<p>21. <u>Reporting Requirements</u></p> <ul style="list-style-type: none"> (a) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-16-.04(9). (b) Deviations from permit requirements shall be reported within 48 hours or 2 working day of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken. 	<p>Rule 335-3-16-.05(c)3.</p>
<p>22. <u>Emission Testing Requirements</u></p> <p>Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.</p>	<p>Rule 335-3-1-.05(3) and Rule 335-3-1-.04(1)</p>

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<p>The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.</p> <p>To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:</p> <ol style="list-style-type: none"> (1) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests. (2) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning). (3) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity. (4) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances. <p>A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.</p> <p>All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.</p>	<p>Rule 335-3-1-.04</p> <p>Rule 335-3-1-.04</p>
<p>23. <u>Payment of Emission Fees</u></p> <p>Annual emission fees shall be remitted each year according to the fee schedule in ADEM Admin. Code R. 335-1-7-.04.</p>	<p>Rule 335-1-7-.04</p>

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<p>24. <u>Other Reporting and Testing Requirements</u></p> <p>Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.</p> <p>25. <u>Title VI Requirements (Refrigerants)</u></p> <p>Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.</p> <p>No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.</p> <p>The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.</p> <p>26. <u>Chemical Accidental Prevention Provisions</u></p>	<p>Rule 335-3-1-.04(1)</p> <p>40 CFR 82</p>

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<p>If a chemical listed in Table 1 of 40 CFR Part 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:</p> <ul style="list-style-type: none"> (a) The owner or operator shall comply with the provisions in 40 CFR Part 68. (b) The owner or operator shall submit one of the following: <ul style="list-style-type: none"> (1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or, (2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. 	<p>40 CFR Part 68</p>
<p>27. <u>Display of Permit</u></p> <p>This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and will be made readily available for inspection by any or all persons who may request to see it.</p>	<p>Rule 335-3-14-.01(1)(d)</p>
<p>28. <u>Circumvention</u></p> <p>No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.</p>	<p>Rule 335-3-1-.10</p>
<p>29. <u>Visible Emissions</u></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.</p>	<p>Rule 335-3-4-.01(1)</p>
<p>30. <u>Fuel-Burning Equipment</u></p>	

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(a) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.03.	Rule 335-3-4-.03
(b) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-5-.01.	Rule 335-3-5-.01
31. <u>Process Industries – General</u>	
Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.04.	Rule 335-3-4-.04
32. <u>Averaging Time for Emission Limits</u>	
Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.	Rule 335-3-1-.05

Summary Page for Tunnel Kilns 1 & 2 and Dryer

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
TK-1 & TK-2	Tunnel Kilns 1 & 2 controlled by Dry Lime Injection Fabric Filter (DIFF-1)	PM	The lesser of 15 lb/hr or the allowable set by $3.59P^{0.62}$ (each)	335-3-14-.04 (Anti-PSD Limit)
TK-1, TK-2, & D-1	Tunnel Kilns 1 & 2 controlled by Dry Lime Injection Fabric Filter (DIFF-1)	SO ₂	N/A	N/A
TK-1, TK-2, & D-1	Tunnel Kilns 1 & 2 controlled by Dry Lime Injection Fabric Filter (DIFF-1)	NO _x	N/A	N/A
TK-1, TK-2, & D-1	Tunnel Kilns 1 & 2 controlled by Dry Lime Injection Fabric Filter (DIFF-1)	CO	N/A	N/A
TK-1, TK-2, & D-1	Tunnel Kilns 1 & 2 controlled by Dry Lime Injection Fabric Filter (DIFF-1)	VOC	N/A	N/A
TK-1, TK-2, & D-1	Tunnel Kilns 1 & 2 controlled by Dry Lime Injection Fabric Filter (DIFF-1)	HCl	The lesser of 2.055 lb/hr and 9.9 TPY of any single HAP; 23.5 TPY of any combination of HAPs	335-3-16-.01(q)(i)
TK-1, TK-2, & D-1	Tunnel Kilns 1 & 2 controlled by Dry Lime Injection Fabric Filter (DIFF-1)	HF	The lesser of 2.055 lb/hr and 9.9 TPY of any single HAP; 23.5 TPY of any combination of HAPs	335-3-16-.01(q)(i)
TK-1, TK-2, & D-1	Tunnel Kilns 1 & 2 and Dryer	Opacity	(See General Proviso 29)	335-3-4-.01(1) SIP
D-1	Dryer	PM	The lesser of 4 lb/hr or the allowable set by $3.59P^{0.62}$	335-3-14-.04 (Anti-PSD Limit)

Provisos for Tunnel Kilns 1 & 2 and Dryer

Federally Enforceable Provisos	Regulations
<p><u>Applicability</u></p> <ol style="list-style-type: none"> 1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits". 2. This source has enforceable limits in place in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]". 	<p>Rule 335-3-16-.03</p> <p>Rule 335-3-14-.04</p>
<p><u>Emission Standards</u></p> <ol style="list-style-type: none"> 1. The particulate emission rate from each kiln in this unit shall not exceed the lesser of 15 lbs/hr or the allowable set by Rule 335-3-4-.04. 2. The particulate emission rate from the Brick Dryer in this unit shall not exceed the lesser of 4 lbs/hr or the allowable set by Rule 335-3-4-.04. 3. The total HF emission rate from tunnel kilns 1 and 2 controlled by DIFF-1 shall not exceed 2.055 lbs/hr and 9.9 TPY, as determined by EPA Method 26A of 40 CFR 60, Appendix A. 4. The total HCL emission rate from kilns 1 and 2 controlled by DIFF-1 shall not exceed 2.055 lbs/hr and 9.9 TPY, as determined by EPA Method 26A of 40 CFR 60, Appendix A. 	<p>Rule 335-3-14-.04</p> <p>Rule 335-3-14-.04</p> <p>Rule 335-3-16-.01</p> <p>Rule 335-3-16-.01</p>
<p><u>Compliance and Performance Test Methods and Procedures</u></p> <ol style="list-style-type: none"> 1. EPA Reference Method 9 of Appendix A of CFR; Title 40, Part 60 (Latest Edition) or alternative approved by the Department will be used in the determination of the opacity of the stack emissions. 2. EPA Reference Method 5 of Appendix A of CFR; Title 40, Part 60 (Latest Edition) or alternative approved by the Department will be used for any testing conducted to determine compliance with particulate matter emissions. 3. EPA Reference Method 26A of Appendix A of CFR; Title 40, Part 60 (Latest Edition) or alternative approved by the Department will be used for any testing conducted to determine compliance with HF and HCL emissions. 	<p>Rule 335-3-1-.05</p> <p>Rule 335-3-1-.05</p> <p>Rule 335-3-1-.05</p>

Emission Monitoring

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| 1. The facility shall perform a visual check, once per week, of the stacks associated with these units. This check shall be performed by a person familiar with Method 9. If instantaneous visible emissions in excess of 10% opacity are noted, and are not corrected within a period of 1 hour, then a Method 9 must be performed within 4 hours of the observations. Maintenance shall be performed as needed. All corrective action or observed problems shall be recorded. | Rule 335-3-16-.05(c) |
| 2. After the corrective action has been performed, the permittee shall conduct another visual check to ensure that the visible emissions have been reduced. | Rule 335-3-16-.05(c) |
| 3. The facility shall monitor and record the pressure drop across the DIFF once per day. Corrective action shall be performed if the pressure drop falls out of the range established by the facility. | Rule 335-3-16-.05(c) |
| 4. The facility shall maintain free-flowing lime in the feed hopper or silo and to the DIFF at all times for continuous injection systems; maintain the feeder settings at or above the level established during the performance3 test for continuous injection systems. | Rule 335-3-16-.05(c) |

Recordkeeping and Reporting Requirements

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| 1. The facility shall maintain a record of all inspections, to include visible observations and Method 9 observations performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years. | Rule 335-3-16-.05(c) |
| 2. If a visible emission observation is required using 40 CFR, Part 60, Appendix A, Method 9, the results will be documented using an ADEM visible emissions observation report and the cause and corrective action taken will be documents in a form suitable for inspection. | Rule 335-3-16-.05(c) |

Summary Page for Clay Body Preparation

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
C-1	Crusher	PM	The lesser of 10 lb/hr or the allowable set by $17.31P^{0.16}$	335-3-14-.04 (Anti-PSD Limit)
G-1	Grinder	PM	The lesser of 2.5 lb/hr or the allowable set by $17.31P^{0.16}$	335-3-14-.04 (Anti-PSD Limit)
S-1	Screens	PM	The lesser of 2.5 lb/hr or the allowable set by $17.31P^{0.16}$	335-3-14-.04 (Anti-PSD Limit)
FUG	Fugitive Dust	PM	Less than 15% from crusher, Less than 10% from any transfer point on belt conveyors or any other affected facility	40 CFR 60.670 Subpart OOO

Provisos for Clay Body Preparation

Federally Enforceable Provisos	Regulations
<u>Applicability</u>	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. This source has enforceable limits in place in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-14-.04
3. Each crusher, screening operations and belt conveyors associated with the clay body preparation operation are subject to the applicable requirements of Federal New Source Performance Standards (NSPS) 40 CFR 60 Subpart OOO.	40 CFR 60.670 Subpart OOO, Rule 335-3-10-.02
<u>Emission Standards</u>	
1. The particulate emission rate from the crusher in this unit shall not exceed the lesser of 10 lbs/hr or the allowable set by Rule 335-3-4-.04.	Rule 335-3-14-.04
2. The particulate emission rate from the grinder in this unit shall not exceed the lesser of 2.5 lbs/hr or the allowable set by Rule 335-3-4-.04.	Rule 335-3-14-.04
3. The particulate emission rate from the screens in this unit shall not exceed the lesser of 2.5 lbs/hr or the allowable set by Rule 335-3-4-.04.	Rule 335-3-14-.04
4. Fugitive emissions can not exceed 10 % opacity from any transfer point on belt conveyors or from any other affected facility.	40 CFR 60.670 Subpart OOO, Rule 335-3-10-.02
5. From any crusher, at which a capture system is not used, fugitive emissions can not exhibit greater than 15 % opacity.	40 CFR 60.670 Subpart OOO, Rule 335-3-10-.02
<u>Compliance and Performance Test Methods and Procedures</u>	
1. EPA Reference Method 9 of Appendix A of CFR; Title 40, Part 60 (Latest Edition) or alternative approved by the Department will be used in the determination of the opacity of the stack emissions.	Rule 335-3-1-.05

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| 2. EPA Reference Method 5 of Appendix A of CFR; Title 40, Part 60 (Latest Edition) or alternative approved by the Department will be used for any testing conducted to determine compliance with particulate matter emissions. | Rule 335-3-1-.05 |
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Emission Monitoring

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| 1. An observation of each emission point associated with this source will be accomplished at least weekly. If any visible emissions are noted during the above-referenced visual checks, corrective action shall be initiated within 2 hours to reduce the emissions. | Rule 335-3-16-.05(c) |
| 2. After the corrective action has been performed, the permittee shall conduct another visual check to ensure that the visible emissions have been reduced. | Rule 335-3-16-.05(c) |

Recordkeeping and Reporting Requirements

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| 1. Records of all visual checks and corrective actions taken shall be maintained in a form suitable for inspection and kept on site for a period of at least 5 years. | Rule 335-3-16-.05(c) |
| 2. The permittee shall submit a written report of exceedences to the Department semi-annually. | Rule 335-3-16-.05(c) |

Summary Page for Summary Page for 5-Ton Sand & Color Rotary Blender

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
RB-1	5 Ton Sand & Color Rotary Blender with Baghouse	PM	The lesser of 0.10 lb/hr or the allowable set by $3.59(P)^{0.62}$	335-3-14-.04 (Anti-PSD Limit)
RB-1	5 Ton Sand & Color Rotary Blender with Baghouse	Opacity	(See General Proviso 29)	335-3-4-.01(1) SIP

Provisos for 5-Ton Sand & Color Rotary Blender

Federally Enforceable Provisos	Regulations
<u>Applicability</u>	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. This unit has an enforceable limit in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]."	Rule 335-3-14-.04
<u>Emission Standards</u>	
1. The Particulate Matter emissions from the 5-ton sand & color rotary blender shall not exceed the lesser of the Anti-PSD limit of 0.10 lbs/hr or the allowable as set by rule 335-3-4-.04	Rule 335-3-14-.04 Rule 335-3-4-.04
<u>Compliance and Performance Test Methods and Procedures</u>	
1. EPA Reference Method 9 of Appendix A of CFR; Title 40, Part 60 (Latest Edition) or alternative approved by the Department will be used in the determination of the opacity of the stack emissions.	Rule 335-3-1-.05
2. EPA Reference Method 5 of Appendix A of CFR; Title 40, Part 60 (Latest Edition) or alternative approved by the Department will be used for any testing conducted to determine compliance with particulate matter emissions.	Rule 335-3-1-.05
<u>Emission Monitoring</u>	
1. The facility shall perform a visual check, once per week, of the stack associated with this unit. This check shall be performed by a person familiar with Method 9. If instantaneous visible emissions in excess of 10% opacity are noted, and are not corrected within a period of 1 hour, then a Method 9 must be performed within 4 hours of the observations. Maintenance shall be performed as needed. All corrective action or observed problems shall be recorded.	Rule 335-3-16-.05(c)
2. After the corrective action has been performed, the permittee shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-16-.05(c)

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| 3. Each pollution control device shall be inspected and cleaned at least annually. | Rule 335-3-16-.05(c) |
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Recordkeeping and Reporting Requirements

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| 1. The facility shall maintain a record of all inspections, to include visible observations and Method 9 observations performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years. | Rule 335-3-16-.05(c) |
| 2. If a visible emission observation is required using 40 CFR, Part 60, Appendix A, Method 9, the results will be documented using an ADEM visible emissions observation report and the cause and corrective action taken will be documents in a form suitable for inspection. | Rule 335-3-16-.05(c) |
| 5. The permittee shall submit a written report of exceedence of the stack opacity to the Department semi-annually. | Rule 335-3-16-.05(c) |

Summary Page for Sand & Color Coating

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
C-2	Sand & Color Coating with Baghouse	PM	The lesser of 1 lb/hr or the allowable set by 3.59(P) ^{0.62}	335-3-14-.04 (Anti-PSD Limit)
C-2	Sand & Color Coating with Baghouse	Opacity	(See General Proviso 29)	335-3-4-.01(1) SIP

Provisos for Sand & Color Coating

Federally Enforceable Provisos	Regulations
<u>Applicability</u>	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. This unit has an enforceable limit in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]."	Rule 335-3-14-.04
<u>Emission Standards</u>	
1. The Particulate Matter emissions from the sand & color coating shall not exceed the lesser of the Anti-PSD limit of 1 lbs/hr or the allowable as set by rule 335-3-4-.04	Rule 335-3-14-.04 Rule 335-3-4-.04
<u>Compliance and Performance Test Methods and Procedures</u>	
1. EPA Reference Method 9 of 40 CFR Part 60 (Latest Edition) or alternative approved by the Department will be used in the determination of the opacity of the stack emissions.	Rule 335-3-1-.05
2. EPA Reference Method 5 of 40 CFR Part 60 (Latest Edition) or alternative approved by the Department will be used for any testing conducted to determine compliance with particulate matter emissions.	Rule 335-3-1-.05
<u>Emission Monitoring</u>	
1. The facility shall perform a visual check, once per week, of the stack associated with this unit. This check shall be performed by a person familiar with Method 9. If instantaneous visible emissions in excess of 10% opacity are noted, and are not corrected within a period of 1 hour, then a Method 9 must be performed within 4 hours of the observations. Maintenance shall be performed as needed. All corrective action or observed problems shall be recorded.	Rule 335-3-16-.05(c)
2. After the corrective action has been performed, the permittee shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-16-.05(c)

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| 3. Each pollution control device shall be inspected and cleaned at least annually. | Rule 335-3-16-.05(c) |
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Recordkeeping and Reporting Requirements

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| 1. The facility shall maintain a record of all inspections, to include visible observations and Method 9 observations performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years. | Rule 335-3-16-.05(c) |
| 2. If a visible emission observation is required using 40 CFR, Part 60, Appendix A, Method 9, the results will be documented using an ADEM visible emissions observation report and the cause and corrective action taken will be documents in a form suitable for inspection. | Rule 335-3-16-.05(c) |
| 3. The permittee shall submit a written report of exceedence of the stack opacity to the Department semi-annually. | Rule 335-3-16-.05(c) |

APPENDIX A

40 CFR 64

Compliance Assurance Monitoring (CAM)

MONITORING APPROACH: Tunnel Kilns 1 and 2 (TK-1 and TK-2)

	Indicator No. 1	Indicator No. 2
I. Indicator	Visible Emissions (Opacity)	Differential Pressure across filter
Measurement Approach	Stack will be observed weekly for visible emissions.	Differential Pressure will be observed daily and compared to indicator range and corrective action threshold.
II. Indicator Range	If visible emissions are present, certified personnel will observe the emissions within 2 hours of the initial observation.	Differential pressure range is 2.5 to 8 inches of water column
Corrective Action Threshold	If the certified personnel observation exceeds 10% opacity, the facility will investigate and initiate necessary corrective action as soon as practical in order to minimize possible exceedances of the PM standard established in the permit. The facility also will conduct a performance test on the unit if required by ADEM to determine compliance with the PM emission limit using EPA Reference Method 5.	If the pressure differential is out of range, personnel will determine the cause and corrective action.
III. Performance Criteria	Visible emissions (opacity) are observed at the emission point stack DIFF-1	Differential pressure is measured across the filter bank (at inlet and outlet)
Data Representativeness		
QA/QC Practices and Criteria	Personnel performing weekly visible emission observations will be familiar with EPA Method 9. Personnel performing actual opacity determinations will be certified in EPA Method 9. All appropriate personnel will be trained on correct procedures for preventive and corrective actions.	Personnel performing differential pressure readings will be trained how to correctly take the readings and who to inform in case a corrective action is needed.

Monitoring Frequency	The presence of visible emissions will be determined and recorded weekly. If visible emissions are present, certified personnel will perform and record EP Method 9 readings within 2 hours of the initial observation.	The pressure differential will be read and recorded daily and compared with the acceptable data range.
Data Collection Procedures	Visible emissions will be observed weekly and recorded in a log book.	Differential pressures will be read daily and recorded in a log book.